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7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
10

11 AYNUR KABOTA, an individual,
12 Plaintiff,
13 vs.

14 EDUVISION, INC., dba ARIZONA
COLLEGE, a foreign corporation domiciled in
15 Missouri; SENTINEL PEAK CAPITAL, LLC,
dba ARIZONA COLLEGE, a Delaware
16 Limited Liability Company; DIANE
THOMASON, an individual; DANIEL J.
17 NAVARRO, an individual; PATRICIA T.
ALPERT, an individual; MARIE
18 HALLINAN, an individual,
19 Defendants.
20

CASE NO. 2:19-cv-01497-JAD-VCF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
DEFENDANTS EDUVISION, INC.,
MARIE HALLINAN AND PATRICIA T.
ALPERT TO ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF'S
COMPLAINT**

[FIRST REQUEST]

21 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff AYNUR
22 KABOTA ("Plaintiff") and Defendants EDUVISION, INC., d/b/a ARIZONA COLLEGE,
23 MARIE HALLINAN and PATRICIA T. ALPERT ("Defendants"), by and through their
24 respective counsel of record Raelene K. Palmer of THE PALMER LAW FIRM, P.C., and Bruce
25 C. Young, Esq. of the law firm LEWIS BRISBOIS BISGAARD & SMITH LLP, as follows:

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Counsel for Defendants has only recently been retained to represent Defendants in this matter. In light of the numerous allegations and causes of action set forth in the Complaint against several named defendants (including the currently represented Defendants), as well as the need for counsel for Defendants to ethically determine if joint representation of all of the named defendants is appropriate, an extension of time for Defendants to answer or otherwise respond to the Complaint is necessary.

Based on the dates of service, Defendants Eduvision, Inc. and Alpert's responses to Plaintiff's Complaint are due on November 19, 2019 and Defendant Hallinan's response is due on November 26, 2019. In order to allow counsel for Defendants sufficient time to investigate the facts and prepare an appropriate response to the Complaint, the Parties have agreed to stipulate to extend the time for Defendants to respond to Plaintiff's Complaint until December 20, 2019.

This extension is not sought for any improper reason or for the purpose of delay.

DATED this 19th day of November, 2019.

DATED this 19th day of November, 2019.

LEWIS BRISBOIS BISGAARD & SMITH LLP

THE PALMER LAW FIRM, P.C.

By /s/ Bruce C. Young, Esq.

By /s/ Raelene K. Palmer

Bruce C. Young, Esq.

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Attorneys for Plaintiff Aynur Kabota

Attorneys for Defendants

Eduvision, Inc., Marie Hallinan and

Patricia T. Alpert

[PROPOSED] ORDER

Pursuant to the Stipulation of the Parties, and good cause appearing therefore:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Defendants' responses to Plaintiff's Complaint shall be filed on or before December 20, 2019.

DATED this 20th day of November, 2019.



UNITED STATES MAGISTRATE JUDGE